

ORIGINAL

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FILED

DISTRICT COURT OF GUAM

FEB 28 2007

MARY L.M. MORAN
CLERK OF COURT

7 Attorneys for the United States of America

8 IN THE UNITED STATES DISTRICT COURT

9 FOR THE TERRITORY OF GUAM

10 UNITED STATES OF AMERICA,) CRIMINAL CASE NO. 07-00022

11 Plaintiff,) INDICTMENT

12 vs.)

13 EDWARD M.C. GUERRERO,) **FRAUDULENT USE OF A CREDIT CARD**

[15 U.S.C § 1644] (Count I)

ACCESSING DEVICE FRAUD

[18 U.S.C. §1029] (Count II)

14 Defendant.)

15

16 THE GRAND JURY CHARGES:

17 **COUNT I - FRAUDULENT USE OF A CREDIT CARD**

18 On or about December 2006, the exact date being unknown, in the District of Guam, the
19 defendant, EDWARD M.C. GUERRERO, willfully and knowingly, in a transaction affecting
20 interstate or foreign commerce, in that the stolen or fraudulently obtained Citibank credit card is
21 serviced by a Citibank call center located in Manila, Philippines and Citibank is a
22 multinational corporation with banking entities throughout the United States and the world, did
23 use a lost, stolen or fraudulently obtained Citibank credit card to obtain goods, services and
24 things of value within a one-year period, said goods, services and things of value having an
25 aggregating value in excess of \$1,000.00, in violation of Title 15, United States Code, Section
26 1644.

27 //

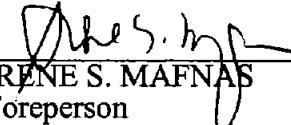
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1 **COUNT II - ACCESSING DEVICE FRAUD**

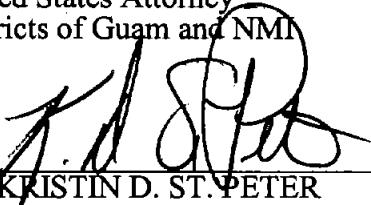
2 On or about December 2006, in the District of Guam, the defendant, EDWARD M.C.
3 GUERRERO, knowingly and with intent to defraud used one unauthorized access device(s) as
4 defined in subsections (e)(1) and (3) e.g. a Citibank credit card No. XXXX060249352101, and by
5 such conduct, from on or about December 20, 2006 and ending on or about December 31, 2006,
6 obtained items of values aggregating to an amount of \$1,543.00, said use affecting interstate or
7 foreign commerce, in that the stolen or fraudulently obtained credit card is serviced by a
8 Citibank call center located in Manila, Philippines and Citibank is a multinational corporation
9 with banking entities throughout the United States and the world, in violation of 18 U.S.C.
10 1029(a)(2).

11 DATED this 28th day of February 2007.

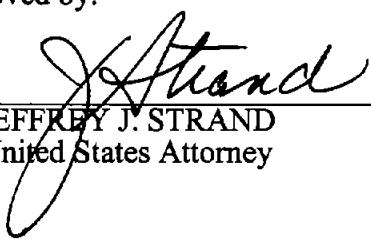
12 A TRUE BILL.

13 
14 IRENE S. MAFNAS
15 Foreperson

16 LEONARDO M. RAPADAS
17 United States Attorney
18 Districts of Guam and NMI

19 By: 
20 KRISTIN D. ST. PETER
21 Special Assistant U.S. Attorney

22 Approved by:

23 By: 
24 JEFFREY J. STRAND
25 United States Attorney